REMARKS

Applicants submit this Request for Reconsideration in reply to the Office Action dated December 11, 2003. Claims 17-29, 31-48, 50-52, and 76-81 are currently pending in this application.

As an initial matter, Applicants gratefully acknowledge the Examiner's indication of the allowance of claims 80 and 81 and the allowability of claims 22 and 41. However, because Applicants believe independent claims 17 and 36, from which claims 22 and 41 respectively depend, are patentable over the cited references, Applicants have not rewritten claims 22 and 41 into independent form at this time.

On pages 2-6 of the Office Action, claims 17, 18, 20, 21, 27-29, 31-37, 39, 40, 46-48, and 50-52 were rejected under 35 U.S.C. § 103(a), as being unpatentable over Sperling et al. in view of Korenage et al. Claims 19, and 38 were rejected under 35 U.S.C. § 103(a), as being unpatentable over Sperling et al. in view of Sasada et al. Claims 23-26, 42-45, and 76-79 were rejected under 35 U.S.C. § 103(a), as being unpatentable over Sperling et al. in view of Tokuda et al.

Applicants respectfully traverse the rejections under 35 U.S.C. § 103(a) of claims 17 and 36 provided in the outstanding Office Action because the cited prior art fails to disclose or suggest each element recited in independent claims 17 and 36. For example, Sperling et al. and Korenage et al., do not teach or suggest, among other things, a stage assembly comprising a base having an upper side supporting a stage and an actuator disposed adjacent to a side outer surface of the base to generate a correction torque about an axis perpendicular to the upper side of the base.

Sperling et al. discloses a positioning device having X-actuators (45, 47) and Y-actuators (49), a support body (43), and a carrier (67), as shown in Figs. 1-3. Sperling et al. further discloses anti-drift actuators (73, 75, 77) fastened to the carrier (67) and exerting anti-drift forces to prevent the support body (43) from drifting towards an edge of the carrier (67). However, as indicated on page 3 of the Office Action, in lines 15-16, "Sperling et al. does not disclose the actuator for generating the correction torque located on the side outer surface of the base".

Korenage et al. discloses a stage apparatus having a movable stage (1), a base (2) having a reference plane, and rotating mechanisms (4x, 4y), as shown in Fig. 1. Korenage et al. further discloses preventing production of an angular acceleration about an X-axis and a Y-axis in the stage by controlling a motor of the rotating mechanisms (4x, and 4y). *See* col. 5, lines 60-66, and col. 6, lines 1-26. Even assuming *arguendo* that the portion of the base (2) that driving mechanisms (9x, 9y) and wafer stage (1) are disposed upon corresponds to "a base having an upper side supporting the stage" as set forth in claims 17 and 36, the rotating mechanisms (4x, 4y) do not generate a correction torque about an axis perpendicular to the upper side of the base (2) (e.g., at least somewhat in the Z-direction).

Moreover, to the extent that a fifth rotating mechanism (4z) of Korenage et al. may be interpreted as the recited actuator, it is not disposed adjacent to a side outer surface of the base (2). As shown in Fig. 6, Korenage et al. discloses a fifth rotating mechanism (4z) producing a moment around an axis at right angles to the reference plane. *See* col. 6, lines 37-49. However, as shown in Fig. 6, the fifth rotating mechanism (4z) is centrally positioned, within base (2). Accordingly, even if the fifth

rotating mechanism (4z) could be interpreted as the recited actuator, it is not disposed adjacent to a side outer surface of the base (2).

For at least these reasons, both Sperling et al. and Korenage et al., relied upon separately or in combination, fail to render obvious the invention defined in independent claims 17 and 36. Moreover, neither Sasada et al. nor Tokuda et al. remedy at least this deficiency of Sperling et al. and Korenage et al. Indeed, the Examiner did not assert otherwise in the Office Action. Accordingly, Applicants request the rejection of independent claims 17 and 36 be withdrawn.

For the same reasons as above and because of their dependency upon independent claims 17 and 36, the rejections of claims 18-22, 23-29, 31-35, 37-41, 42-48, 50-52, and 76-79 under 35 U.S.C. § 103(a) should be withdrawn.

In addition, Applicants traverse the rejection of claims 19, 23-26, 38, 42-45, and 76-79 under 35 U.S.C. § 103(a) because the cited references fail to disclose or suggest an actuator for generating correction torque located at the side outer surface of the base. *See* page 3, lines 16-18, of the final Office Action (paper no. 11).

The outstanding Office Action contains characterizations of the claims and the related art with which Applicants do not necessarily agree. Unless expressly noted otherwise, Applicants decline to subscribe to any statement or characterization of the Office Action.

In discussing the specification, claims, abstract, and drawings in this Request for Reconsideration, it is to be understood that Applicants are in no way intending to limit the scope of the claims to any exemplary embodiments described in the specification or abstract and/or shown in the drawings. Rather, Applicants are entitled to have the

claims interpreted broadly, to the maximum extent permitted by statute, regulation, and applicable case law.

Please grant any extensions of time required to enter this Request for Reconsideration and charge any additional required fees to our Deposit Account No. 06-0916.

Respectfully submitted,

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